

PHILLIPS & ASSOCIATES

*Attorneys at Law*

45 BROADWAY, SUITE 430, NEW YORK, NEW YORK 10006

TEL: (212) 248-7431 FAX: (212) 901-2107

[WWW.NYCEMPLOYMENTATTORNEY.COM](http://WWW.NYCEMPLOYMENTATTORNEY.COM)

A PROFESSIONAL LIMITED LIABILITY COMPANY

March 14, 2022

**Via ECF:**

Hon. Mary Kay Vyskocil  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 2230  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
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DATE FILED: 3/16/2022

Re: **Shanell James v. New York City Botanical Gardens**  
**Dkt. No. 21 Civ. 10746 (MKV)(SN)**

Your Honor:

This firm represents the Plaintiff, Shanell James ("Plaintiff") in the above referenced action. The parties write jointly to respectfully request an adjournment of the Initial Pretrial Conference currently scheduled for Thursday, March 17, at 10:00am until a date and time after the parties attend mediation currently scheduled for April 14, 2022 at 10:00am. This is the parties first request to adjourn the Initial Pretrial Conference. The parties request will not affect any future deadlines.

By way of background, Plaintiff alleges Defendant failed to provide reasonable accommodations and unlawfully terminated him in violation of the ADA, NYHRL, and NYCHRL. Defendant denies Plaintiff's allegations. On January 25, 2022, Defendant interposed its answer, and this Court automatically referred the parties for mediation pursuant to the Second Amended Standing Order regarding counseled employment discrimination cases (See Dkt. Nos. 7 and 8). In furtherance of that Order, the parties scheduled the mediation for April 14, 2022, at 10:00am.

The parties make the herein request to adjourn the Initial Pretrial Conference to attend mediation first before incurring the time and expense of full discovery. As such, the parties jointly respectfully request the Court adjourn the Initial Pretrial Conference (and pre-conference filings) to a date and time following the mediation scheduled for April 14, 2022.

The parties the Court for its time and consideration of the herein request.

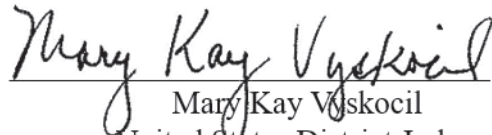
Respectfully,  
PHILLIPS & ASSOCIATES

/s/  
Joshua Friedman, Esq.  
Phillips & Associates, PLLC  
585 Stewart Avenue, Suite 410  
Garden City, NY 11530  
(212) 248-7431  
[jfriedman@tpglaws.com](mailto:jfriedman@tpglaws.com)

Cc (via ECF): all counsel of record

GRANTED. The IPTC is ADJOURNED to April 22, 2022 at 11:30 a.m. Joint letter and proposed CMP due one week before the conference.

Date: March 16, 2022  
New York, New York

  
Mary Kay Vyskocil  
United States District Judge